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TRANSMITTAL LETTER FOR THE DRAFT RESPONSES TO U S EPA REGION V
COMMENTS ON THE INTERIM MEASURES WORK PLAN FOR SOLID WASTE
MANAGEMENT UNIT 13 MINE FILL B NSA CRANE IN
6/13/2008
TETRA TECH



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PITT-06-8-028

June 13, 2008

Project No. 112G00352

Mr. Howard Hickey
NAVFAC MW
201 Decatur Avenue
Building 1A, Code EV
Great Lakes, Illinois 60088

Subject: CLEAN Contract No. N62467-04-D-0055
Contract Task Order (CTO) No. 0020

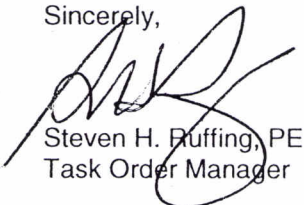
RE: **Draft**
Response to United States Environmental Protection Agency (EPA) E-Mail Comments
Dated June 12, 2008 on Interim Measures Work Plan (IMWP) for Solid Waste
Management Unit (SWMU) 13 (Mine Fill B)
Naval Surface Warfare Center (NSWC) Crane
Crane, Indiana

Dear Mr. Hickey:

Enclosed are the draft responses to the June 12, 2008 EPA comments on the SWMU 13 IMWP (Enclosure 1). Per the Navy's request, an electronic copy of responses will be sent via e-mail for submission to EPA.

Please contact the undersigned at 412-921-8989 (e-mail: Steve.Ruffing@tetrattech.com) or Valerie Plachy at 412-921-8389 (e-mail: Valerie.Plachy@tetrattech.com) regarding any questions or comments.

Sincerely,



Steven H. Ruffing, PE
Task Order Manager

VJP:SHR/mlg
Enclosures

cc: Mr. Tom Brent, NSWC Crane (letter and enclosure)
Ms. Bonnie Capito, NAVFAC Atlantic (PDF copy of letter via e-mail)
Mr. John Trepanowski, Tetra Tech (letter and enclosure)
Mr. Ralph Basinski, Tetra Tech (letter and enclosure)
Mr. Steve Ruffing, Tetra Tech (letter and enclosure)
Ms. Valerie Plachy, Tetra Tech (letter only)
Mr. Garth Glenn, Tetra Tech (letter only)
Project File – CTO 0020 (Midwest)

Tetra Tech NUS, Inc.

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ENCLOSURE 1

**DRAFT RESPONSES TO THE JUNE 12, 2008 EPA COMMENTS
ON THE SWMU 13 IMWP**

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**RESPONSE TO COMMENTS (RTCs) DATED JUNE 12, 2008
FROM UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
(E-MAIL FROM PETER RAMANAUSKAS)
ON THE INTERIM MEASURES WORK PLAN (IMWP) EPA RTCs DATED JUNE 9, 2008
FOR SWMU 13 – MINE FILL B
NAVAL SURFACE WARFARE CENTER
CRANE, INDIANA**

Comments provided by the EPA are shown in bold font. Responses following each EPA comment are shown in regular font. Changes to the IMWP are italicized and enclosed in quotation marks.

EPA-1(6-12-08)

Regarding EPA-5c: At this time, under the risk-based approvals process, the TSCA program requires that > 50 ppm soils must be disposed of in a TSCA-approved landfill (not at a RCRA landfill).

Response to EPA-1(6-12-08): Agreed. The typographical error has been corrected. The response to EPA-5c (4-10-08) has been revised as follows:

"Response to EPA-5c (4-10-08): All initial characterization of soil and sediments is based on the in situ characterization. The segregation and off-site disposal of excavated material will be based on in-place soil and sediment concentrations. Soil and sediments containing total-PCB concentrations greater than 50 mg/kg will be stockpiled separately and transported and disposed at a TSCA regulated landfill. No in-place sediments have been identified at concentrations greater than 50 mg/kg.

"Based on the available analytical data, six sample locations contain total-PCBs at concentrations that exceed 50 mg/kg. Figures 3-1, 3-2, and 3-3 have been revised to indicate the locations of the soils that must be stockpiled separately for disposal at a TSCA regulated landfill. Additionally, the text and volume tables have been updated to indicate the inclusion of material to be disposed at a TSCA regulated landfill. Additional sampling for disposal will be performed based upon requirements of the selected landfill.

"Numerous revisions to the IMWP text have been made in response to this comment for the primary work and Options 1 and 2. Language revisions will be similar to the following:

- Off-Site Disposal of Soils – Excavated soil containing PCBs will be disposed at an appropriate off-site facility based on the in-place (in-situ) concentration of PCBs. Soils with in-situ PCB concentrations greater than or equal to 50 ppm (50 milligrams per kilogram (mg/kg)) will be surgically removed and segregated from soils with in-situ PCB concentrations less than 50 ppm. Soils with PCB concentrations greater than or equal to 50 ppm will be disposed in a TSCA-approved or TSCA landfill. Soils with PCB concentrations less than 50 ppm will be disposed at an NSWCC Crane-approved solid waste landfill."

EPA-2(6-12-08)

Regarding EPA-6: For the channel excavation areas, we propose you also take a composite sample every 100 ft along the low-point of the trench (i.e. along the bottom of the V/U). Since the language associated with the sampling will be incorporated in this IMWP and the approved QAPP for the project containing different sampling language will not be modified, describe how will you ensure that the contractor will be following the correct sampling scheme. Please reiterate in the IMWP how many aliquots will make up a composite sample.

Response to EPA-2(6-12-08): To accommodate the collection of an additional composite sample along the centerline of the drainage channel following excavation, the text has been revised to

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include the collection of five composite samples for every 100 linear feet of drainage channel excavated. Due to the irregular shape of the excavation, the fifth composite sample will be collected from an area designated as the base of the excavation along the centerline of the channel. This area will measure approximately 4 feet wide centered on the center of the drainage channel. The text in Section 5.2, Subsection, "Drainage Channel Excavation Areas" has been revised as follows:

- *"Drainage Channel Excavation Areas - Verification samples will be collected from the exposed drainage channel base and sidewalls and the exposed overflow area floors. As shown on Figure 5-1, due to the irregular shape of the drainage channel excavation, two verification samples will be collected from the exposed overflow floor areas (Areas 1 and 5) located on each side of the channel (i.e., from the channel overflow areas), two verification samples will be collected from the two exposed drainage channel sidewall surfaces (Areas 2 and 4), and one verification sample will be collected along the exposed drainage channel base where the exposed base is not bedrock (Area 3). Verification samples will be composite samples as described in the QAPP (TtNUS, 2006). These five composite samples make up one set of verification samples. At a minimum, one set of verification samples will be collected from each drainage channel segment and for every 100 linear feet of drainage channel excavation. Therefore, based on the proposed length of drainage channel excavation (470 feet split across four channel segments), seven sets of samples, consisting of five verification samples per set, will be collected from the proposed SWMU 13 drainage channel excavation areas. In the event that a drainage pipe is encountered during the drainage channel excavation process, the frequency of verification sample collection will be increased to one set of verification samples for every 25 linear feet of drainage channel excavation for a distance of 100 feet downstream of the exposed drainage pipe. The verification samples will be analyzed for PCBs. The results of these verification samples will be evaluated to determine whether PCB contamination remains in the exposed surface soil at concentrations greater than 1 mg/kg. In the event that a verification sample result exceeds 1 mg/kg (from floor samples or sidewall samples), the Navy may direct that the excavation be extended in the appropriate direction(s) to remove this soil. The extent of additional excavation will depend on the location and concentration of the exceedances. Additional verification samples will be collected following any additional excavation. Excavation expansion may continue until verification samples indicate that PCB concentrations are less than 1 mg/kg. The length of drainage channel excavation is based on the results of the RFI and 2006 sediment-sampling events. The results of the verification sample will not increase the length of drainage channel excavation areas."*

The revised Figure 5-1 is presented in Attachment 1.

EPA-3(6-12-08)

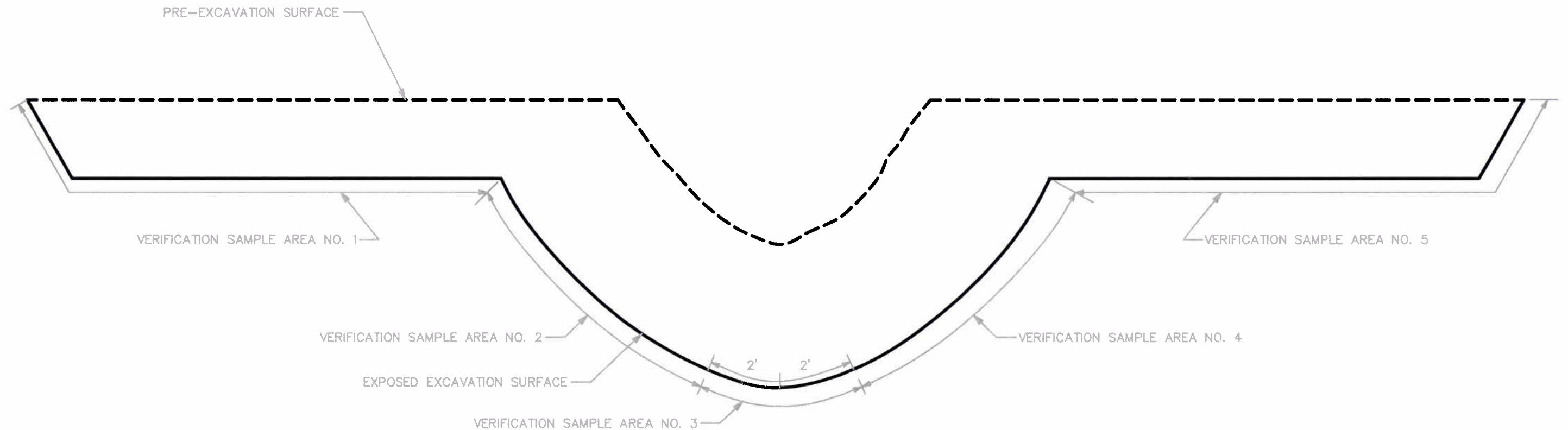
Regarding Finally, and I apologize if we didn't mention it before, but George Ritchotte at IDEM should have a copy of the final workplan and the responses to comments as IDEM will have to write an approval letter as well. These are typically coordinated approvals with EPA. When you send the package, you can let George know that we are OK with it.

Response to EPA-3(6-12-08): This comment is noted.

ATTACHMENT 1

REVISED FIGURE 5-1

DRAINAGE CHANNEL VERIFICATION SAMPLING



NOTE:

FOR EVERY 100 FEET OF DRAINAGE CHANNEL EXCAVATION, ONE SET OF FIVE VERIFICATION SAMPLES WILL BE COLLECTED. A MINIMUM OF ONE SET OF FIVE VERIFICATION SAMPLES WILL BE COLLECTED FROM EACH DRAINAGE CHANNEL SEGMENT. AS AN EXCEPTION, IF DRAINAGE PIPES ARE ENCOUNTERED (EXPOSED) DURING EXCAVATION WITHIN THE DRAINAGE CHANNELS THE SAMPLING FREQUENCY WILL BE INCREASED TO ONE SET OF FIVE FOR EVERY 25 FEET OF DRAINAGE CHANNEL FROM THE DRAINAGE PIPE DISCHARGE LOCATION TO A DISTANCE OF 100 FEET DOWN STREAM OF THE DISCHARGE LOCATION.

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DRAINAGE CHANNEL
VERIFICATION SAMPLING
SWMU 13 – MINE FILL B
INTERIM MEASURES WORK PLAN
NSWC CRANE
CRANE, INDIANA

CONTRACT NO.	0352
OWNER NO.	0020
APPROVED BY	DATE
DRAWING NO.	REV.
FIGURE 5-1	0